

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 22-10141-WGY
)	
SEAN O'DONOVAN,)	
)	
Defendant)	

**ASSENTED-TO MOTION FOR LEAVE TO FILE EXHIBITS TO
OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR
"OUTRAGEOUS GOVERNMENT CONDUCT" UNDER SEAL**

The government hereby requests leave of Court to file the exhibits to its Opposition to Defendant's Motion to Dismiss for "Outrageous Government Conduct" under seal. As grounds therefore, the exhibits include materials that disclose the identity of a cooperating witness, as well as additional sensitive information. The government provided the materials to Defendant in discovery, but public disclosure of the materials at this time would prematurely identify a cooperating witness and generate unnecessary publicity. Counsel for Defendant has assented to the relief requested herein.

Dated: September 30, 2022

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S. Department of Justice

By: Kristina E. Barclay
Kristina E. Barclay
Assistant United States Attorney

By: Jonathan E. Jacobson
Jonathan E. Jacobson
Trial Attorney, Public Integrity Section
U.S. Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of September 2022 I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing to all attorneys of record.

/s/ Kristina E. Barclay
Kristina E. Barclay
Assistant United States Attorney